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File Number: 882604-79

June 20, 2023

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BY ECF

Hon. James L. Cott
 United States District Court
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl St.
 New York, NY 10007

Re: *US Airways, Inc., for American Airlines, Inc. as Successor and Real Party in Interest v. Sabre Holdings Corp., et al.*, No. 1:11-cv-02725-LGS
Request to File on CD and File Extended Declaration

Dear Judge Cott:

We write on behalf of Plaintiff US Airways, Inc. and its successor-in-interest, American Airlines (“US Airways”) in connection with US Airways’ forthcoming Motion for Costs, Including Attorneys’ Fees and Expenses, Under 15 U.S.C. § 15 due to be filed on June 23, 2023 (ECF No. 1288).

Pursuant to Electronic Case Filing Rules & Instructions 5.2, we seek permission to file on a compact disc (“CD”) Excel spreadsheets detailing attorneys’ time entries and expenses. Some of these spreadsheets will be attached as exhibits to my declaration in support of the motion; the remaining Excel files will be attached as exhibits to declarations from consultants retained by US Airways in this litigation. We request to file these files on CD rather than on ECF because the spreadsheets contain too much data to be legibly converted to PDF files and the Court (and Sabre) cannot filter, sort, and analyze the data in PDF files. Judge Schofield had previously granted similar requests in connection with US Airways’ 2017 motion under 15 U.S.C. § 15. See ECF Nos. 850, 899, 909. We will also be requesting redactions to protect the confidentiality of US Airways’ attorney time entries. We will file a redaction request concurrent with our motion, under Section (II)(G)(3)(b) of Your Honor’s Individual Practices.

Additionally, under Judge Schofield’s Individual Rules and Procedures for Civil Cases, any declaration in support of a motion must not exceed ten double-spaced pages. See Rule (III)(B)(3). Although the Local Rules and your individual rules do not contain such a requirement, out of an abundance of caution, we request to file an attorney declaration in support of our motion with the Court of no more than thirty double-spaced pages. Given the extensive work for which US Airways is seeking attorneys’ fees and expenses, a thorough declaration is necessary to aid the Court in its decision.



Respectfully submitted,

/s/ Andrew Frackman

Andrew Frackman
of O'MELVENY & MYERS LLP

cc: Counsel of record (by ECF)